



# Missouri Coalition for the Environment

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March 13, 2014

Dr. Karl Brooks  
Regional Administrator, Region 7  
Environmental Protection Agency  
11201 Renner Blvd.  
Lenexa, KS 66219

Re: St. Louis Army Corps of Engineers FUSRAP at West Lake Landfill

On February 28, 2014, Senator McCaskill, Senator Blunt, Congresswoman Wagner, and Congressman Clay sent a letter to EPA Region 7 requesting the United States Army Corps of Engineers (USACE) Formerly Utilized Sites Remedial Action Program (FUSRAP) in St. Louis be involved at the West Lake Landfill Superfund site. Specifically, the letter says:

We believe that the Agency should work with the Army Corps of Engineers and its Formerly Utilized Sites Remedial Action Program (FUSRAP) operation in the St. Louis area.

The St. Louis Corps' handling of similar radiologically impacted material at the St. Louis Downtown Site, the St. Louis Airport Site and Vicinity Properties, Latty Avenue, and the Madison Site has been a well-documented success. Given the Corps' expertise in this area, and the local community's faith in the Corps' FUSRAP mission, we request that the EPA consider contracting directly with the Corps to handle any and all remediation needed at the site. Additionally, we believe that it would also be beneficial for the Agency to contract with the Corps to conduct the ongoing review of the Record of Decision to determine the appropriate long-term remediation.

The Missouri Coalition for the Environment (MCE) submitted questions to EPA Region 7 on January 30, 2014, regarding the West Lake Landfill. EPA Region 7 responded on March 5, 2014, which MCE appreciates. In response to a question about contracting the U.S. Army Corps of Engineers (USACE) Formerly Utilized Sites Remedial Action Program (FUSRAP) in St. Louis at the West Lake Landfill, EPA Region 7 stated, "EPA is considering utilizing USACE technical assistance for both the installation of the isolation barrier and in developing a revised Proposed Plan and Record of Decision for OU-1." While encouraging, the St. Louis Corps of Engineers FUSRAP is not explicitly mentioned.

MCE recommends that EPA Region 7:

1. Contract the St. Louis Army Corps of Engineers FUSRAP as the lead contractor to perform activities described in the letter sent to EPA Region 7 by Missouri federally elected officials and work related to the isolation barrier. The St. Louis Corps of Engineers FUSRAP work at the West Lake Landfill must apply FUSRAP cleanup standards to its site investigation, risk assessment, recommendations, or any involvement not specified here. The federally elected officials cite the community's faith in the FUSRAP mission. That faith stems from many reasons, including the conservative cleanup standards used by FUSRAP based on possible human exposure to radioactive wastes now or in the future and active community engagement.
2. Contract the St. Louis Army Corps of Engineers FUSRAP to implement the recommendations made by Dr. Bob Criss of Washington University in his report submitted to EPA Region 7 on March 15, 2013. Dr. Criss' report entitled "Character of Radioactive Waste at the West Lake Landfill, Bridgeton, Missouri" is included for reference.
3. Fully remove EMSI from any involvement moving forward at the West Lake Landfill. As stated above, lead contractor authority should be designated to the St. Louis Corps of Engineers FUSRAP. Impacted community members have lost faith in the Superfund model of financially responsible parties hiring contractors to assess the science and risk to nearby people around the West Lake Landfill. This concern reached a tipping point when EMSI submitted a report to EPA Region 7 on January 24, 2014, claiming there is no environmental or health risk if a smoldering fire comes in contact with the radioactive wastes illegally dumped at the West Lake Landfill in 1973.

The Missouri Coalition for the Environment's recommendations are reasonable and consistent with the letter sent by Senator Blunt, Senator McCaskill, Congresswoman Wagner, and Congressman Clay to EPA Region 7 on February 28, 2014. Therefore, MCE encourages EPA to adopt our recommendations during negotiations between EPA Region 7 and the St. Louis Corps of Engineers FUSRAP regarding future work at the West Lake Landfill.

Thanks,



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